



November 13, 2001

1900 K STREET, N.W.  
WASHINGTON, D.C. 20006-1109

TEL 202 • 955 • 1500  
FAX 202 • 778 • 2201

WILLIAM SILVERMAN  
DIRECT DIAL: 202-419-2013  
EMAIL: [wsilverman@hunton.com](mailto:wsilverman@hunton.com)

FILE NO: 59808.000002

**PUBLIC VERSION**

**VIA ELECTRONIC MAIL**

The Honorable Robert B. Zoellick  
United States Trade Representative  
600 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20508

**Re: Section 201 Investigation -- Carbon and Alloy Flat Products - Cold-Rolled**

Dear Ambassador Zoellick:

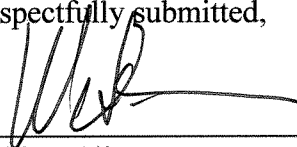
On behalf of SSAB Tunnplat AB ("SSAB") a producer of certain carbon steel products, we hereby submit the attached exclusion request brief in the above-referenced investigation.

In accordance with 15 C.F.R. § 2003.6, we request confidential treatment of information contained in brackets on certain pages and exhibits. Disclosure of this information, which contains business proprietary information of SSAB, would cause substantial harm to SSAB. Specifically, the bracketed information concerns internal SSAB accounting data which we have ranged as requested, as well as proprietary detailed product specifications. Public summaries of the specifications for each product are contained in the text of the brief.

The Honorable Robert B. Zoellick  
November 13, 2001  
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Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,



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William Silverman  
Douglas J. Heffner  
Richard P. Ferrin  
James R. Simoes  
**Hunton & Williams**  
Counsel to SSAB Tunnplat AB

Attachments

**BEFORE THE  
UNITED STATES TRADE REPRESENTATIVE  
WASHINGTON, D.C.**

**PUBLIC VERSION**

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**CERTAIN STEEL PRODUCTS**

**U.S. Inv. No. 201-73 (Remedy Phase)**

Carbon and Alloy Flat Products -  
Cold-rolled

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**REQUESTS FOR EXCLUSIONS  
OF  
SSAB TUNNPLAT AB**

William Silverman  
Douglas J. Heffner  
Richard P. Ferrin  
James R. Simoes  
Hunton & Williams  
1900 K Street, N.W.  
Washington, D.C. 20006  
*Counsel to SSAB Tunnplat AB*

November 13, 2001

**I. Because Domestic Products Are Not Suitable Substitutes For SSAB's Docol Cold-Rolled Products, Docol Products Should Be Excluded From Any Import Relief.**

SSAB Svenkst Stal AB ("SSAB"), hereby requests the exclusion of certain cold-rolled products from relief in the above-referenced investigation. SSAB is a Swedish producer of a wide range of products, including the cold-rolled products discussed herein, that are necessary to the operations of its customers. SSAB customers primarily use SSAB products, including the cold-rolled products discussed herein, primarily in the manufacture of automobiles and heavy equipment, such as cranes and mining equipment. The cold-rolled products listed below all fall under grade SAE 2340. All grades above SAE 2300 have been excluded from the recently instituted dumping case against cold-rolled products from various countries, including Sweden. These products should also be excluded from Section 201 relief.

**Product Designation and Description**

The cold-rolled products produced by SSAB are sold under the brand name Docol. Docol Dual Phase Sheets are imported in product grades Docol 85 DP, Docol 85 DL, Docol 100 DP, Docol 115 DP, Docol 115 DL, Docol 140 DP, Docol 145 DP, Docol 145 DL, Docol 175 DP, and Docol 205 DP, Docol 450 Wear and Docol 450 Defend. Docol Martensitic steels are imported in grades Docol 130 M, Docol 160 M, Docol 190 M and Docol 220 M. All Docol grades covered by this exclusion request fall within grade SAE J2340. All SAE grades above 2300 were excluded from the current cold-rolled dumping case filed on September 28, 2001. Docol products, thus, have already been excluded from the cold-rolled dumping case. Docol products enter the United States under HTS numbers 7209.15.0000, 7209.16.0030, 7209.17.0030, 7209.50.6000, and 7209.50.8085. Docol products have the specifications and chemical compositions listed below:

**Mechanical Properties and Dimensions**

DOCOL	Yield Strength min.	Tensile Strength min.	Elongation %	Bendability	Thickness Range	Width Range
85 DP	50	85	17	0xt for 180°	.197"-.078"	31"-60"
85 DL	40	85	21	0xt for 180°	.197"-.078"	31"-60"
100 DP	80	100	12	1xt for 90°	.197"-.078"	35"-60"
115 DP	72	115	9	1xt for 90°	.197"-.078"	31"-60"
115DL	56	115	14	1xt for 90°	.197"-.078"	31"-60"
130 M	80	130	8	4xt for 180°	.197"-.078"	35"-60"
140 DP	80	140	8	3xt for 90°	.197"-.078"	35"-60"
145 DP	100	145	6	3xt for 90°	.197"-.078"	31"-60"
145DL	72	145	9	3xt for 90°	.197"-.078"	31"-55"
160 M	130	160	4	4xt for 90°	.197"-.078"	35"-49"
175 DP	137	175	4	4xt for 90°	.197"-.078"	35"-49"
190 M	150	190	4	4xt for 90°	.197"-.078"	35"-49"
205 DP	167	205	3	4xt for 90°	.197"-.078"	35"-49"
220 M	180	220	3	4xt for 90°	.197"-.078"	35"-49"

<b>100 W</b>	100	130	5	2xt for 90°	.197”-.078”	31”-60”
<b>*450 Wear</b>	165	205	3	4xt for 90°	.197”-.078”	35”-49”

\*This steel has a 450 Brinell hardness, Hb

	<b>Docol 450 Defend</b>
Hardness	450 H <sub>V</sub>
Thickness Range	.039”-.078”
Width Range	35”-49”

### Chemical Composition Typical Values

DOCOL	C	Si	Mn	P	S	Nb	Al
450 Defend	.17	.5	1.6	.015	.002	.015	.04

### Chemical Composition TV=Typical Values

DOCOL	C TV	Si TV	Mn TV	P Max.	S Max.	Nb TV	Al TV	Cu TV	Cr TV	Micro Alloying Elements
85 DP	.11	.20	.70	.05	.01		.04			
85 DL	.10	.40	1.5	.010	.01		.04			
100 DP	.13	.20	1.5	.020	.004	.015	.04			
115 DP	.13	.20	1.5	.002	.002	.015	.04			
115DL	.14	.20	1.7	.015	.002	.015	.04			
130 M	.07	.20	1.8	.02	.004		.04			
140 DP	.15	.50	1.5	.02	.004	.015	.04			
145 DP	.15	.20	1.5	.015	.002	.015	.04			
145DL	.18	.20	1.6	.015	.002	.015	.04			
160 M	.09	.20	1.70	.020	.004	.015	.04			
175 DP	.11	.20	1.60	.015	.002		.04			
190 M	.13	.20	1.7	.020	.004	.015	.04			
205 DP	.17	.50	1.6	.015	.002	.015	.04			
220 M	.20	.20	1.5	.025	.004	.015	.04			
100 W	.13	.50	1.2	.02				.40	.50	Added
450 Wear	.17	.50	1.60	.01	.01	.015	.04			

### Basis For Requesting An Exclusion

SSAB requests the exclusion of Docol products on the basis that domestic steel producers do not supply a suitable alternative to the market. Only one Docol Dual Phase Steel grade is available domestically - Inland Steel produces a dual phase steel comparable in grade to Docol 175. Only SSAB, however, guarantees minimal yield strength on its cold-rolled dual phase products. Guaranteed yield strength is important in many safety applications, such as seat belts, crash intrusion beams and bumper brackets in automobiles. Similarly, Inland produces cold-rolled products similar to Docol's Martensitic grades, but does not guarantee minimum yield

strength. SSAB's customers would be making safety concessions by using domestic alternatives. Accordingly, domestic cold-rolled products are not suitable substitutes for Docol. This lack of substitutability was acknowledged by the petitioners in the current cold-rolled dumping case, who excluded from that investigation all SAE grades above 2300.

Docol products are of higher quality than domestic alternatives, accompanied by consistently superior service and delivery and unmatched technical support, and sold at a premium as compared to domestic products. Domestic products are not as consistent, have lower impact properties, have larger tolerances on thickness, and are not offered in as wide a range of dimensions as Docol. Docol also has fewer inclusions than domestic products, resulting in improved weldability. Docol products should, thus, be excluded from relief.

### Other Producers

Products comparable in grade to Docol Martensitic grades and Docol 175 Dual Phase are produced by Inland Steel in the United States. Because of the minimum yield guarantee of Docol and the other product characteristics discussed above, however, domestic products are not suitable substitutes for Docol products. These products are also produced by NKK and Nippon Steel in Japan.

### Domestic consumption

From 1996 to 2000, total domestic consumption was roughly 50,000 metric tons annually for dual phase steel and roughly 400,000 metric tons per year for Martensitic steel. SSAB's imports of high grade dual phase and Martensitic high grade products accounted for [25,000] short tons in 1996, [19,000] short tons in 1997, [18,000] short tons in 1998, [24,000] short tons in 1999, and [15,000] short tons in 2000. SSAB forecasts a modest demand growth for its cold-rolled products of roughly 5 percent per year from 2001-2005.

### Domestic Production

Domestic products are not comparable to Docol, but SSAB estimates that Inland Steel produced roughly 50,000 metric tons of dual phase steel and 400,000 metric tons of Martensitic steel annually from 1996-2000.

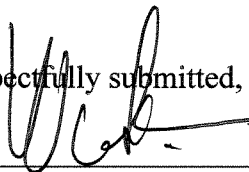
### Domestic Substitutes

There are no suitable domestic substitutes for Docol products. The only known domestic alternative to Docol is produced by Inland Steel. For the reasons stated above, the Inland product is not a substitute for Docol. SSAB estimates that Inland produced roughly 50,000 tons of dual phase steel and 400,000 tons of Martensitic steel for domestic consumption annually from 1996 to 2000.

## **II. CONCLUSION**

For the reasons stated herein, Docol products imported by SSAB should be excluded from Section 201 relief.

Respectfully submitted,



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William Silverman  
Douglas J. Heffner  
Richard P. Ferrin  
James R. Simoes  
**Hunton & Williams**  
*Counsel to SSAB Tunnplat AB*